

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

ECSM UTILITY CONTRACTORS, INC. : **CASE NO. 1-14-02062-MDF**
Debtor/Movant : **CHAPTER 11**

v.

UNITED STATES TRUSTEE, :
PF FUNDING GROUP, LLC :
Respondent :

MOTION TO SELL VEHICLE
FREE AND CLEAR OF LIENS

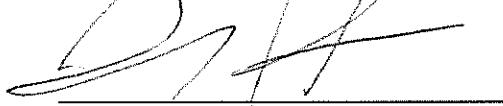
AND NOW, comes Debtor, ECSM Utility Contractors, Inc., by and through its attorney, Gary J. Imblum, and pursuant to 11 U.S.C. § 363 and respectfully represents:

1. Debtor filed a voluntary Petition under Chapter 13 of the Bankruptcy Code on April 30, 2014.
2. Debtor is the owner of a 2008 Chevrolet Uplander, Vehicle Identification Number 1GBDV13198D210778. There are 126, 000 miles on said vehicle.
3. The vehicle will be auctioned at Central Pennsylvania Auto Auction. The cost of the auction will be a flat \$250.00 for the vehicle.
4. PF Funding has a security interest in said vehicle. However, PF Funding has agreed to waive its right to proceeds from said sale.

WHEREFORE, Debtor respectfully requests that this Honorable Court issue an Order approving the sale of aforesaid vehicle, free and clear of liens.

Respectfully submitted,

IMBLUM LAW OFFICES, P.C.



Gary J. Imblum
Attorney I.D. No. 42606
4615 Derry Street
Harrisburg, PA 17111
(717) 238-5250
Fax No. (717) 558-8990
Attorney for Debtor

Dated: 3/23/15